1 2	DANIEL G. BOGDEN United States Attorney District of Nevada
3 4 5 6 7 8	TIMOTHY R. BOLIN, CSBN 259511 Special Assistant United States Attorney Social Security Administration Office of the General Counsel 160 Spear St Ste 800 San Francisco, CA 94105 Telephone: (415) 977-8982 Facsimile: (415) 744-0134 Email: timothy.bolin@ssa.gov Attorneys for Defendant
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11	UNITED STATES DISTRICT COURT
12 13	DISTRICT OF NEVADA
14 15 16 17 18	MARCOS GARCIA, Plaintiff, v. Case No. 2:16-cv-01018-APG-NJK UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST) Defendant.
20 21 22 22 23 24 25 26	Defendant Carolyn W. Colvin, Acting Commissioner of Social Security ("Defendant"), respectfully requests that the time for Defendant to file her response to Plaintiff's Motion for Summary Judgment be extended from October 24, 2016 to November 23, 2016. This is Defendant's first request for an extension of time to respond to Plaintiff's Motion for Summary Judgment.

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1	Defendant requests this extension due to her attorney's inordinately heavy caseload in October
2	2016 through November 2016, including 4 other briefs and 1 post-judgment motion due between
3	October 24, 2016 and October 31, 2016 in the United States District Court for the Northern District of
4	California, Eastern District of California, Central District of California and District of Nevada.
5	Defendant's counsel respectfully requests this additional time to review the Administrative Record, and
6	to evaluate and respond to Plaintiff's arguments.
7	This request is made in good faith with no intention to unduly delay the proceedings.
8	Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion,
9	on October 21, 2016.
10	Respectfully submitted October 21, 2016.
11	DANIEL G. BOGDEN
12	United States Attorney
13	<u>/s/ Timothy R. Bolin</u> TIMOTHY R. BOLIN
14	Special Assistant United States Attorney
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16	OF COUNSEL:
17	DEBORAH LEE STACHEL Regional Chief Counsel, Region IX
18	BEATRICE NA
19	Assistant Regional Counsel
20	IT IS SO ORDERED:
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22	UNITED STATES MAGISTRATE JUDGE
23	DATED: October 24, 2016
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